

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---------------------------------|---|-------------------------------|
| HANGZHOU CHIC INTELLIGENT |) | |
| TECHNOLOGY CO. LTD. and UNICORN |) | |
| GLOBAL, INC., |) | |
| |) | |
| Plaintiffs, |) | Case No. 20-cv-4806 |
| |) | |
| v. |) | Judge Thomas M. Durkin |
| |) | Magistrate Judge Jeffrey Cole |
| THE PARTNERSHIPS AND |) | |
| UNINCORPORATED ASSOCIATIONS |) | |
| IDENTIFIED ON SCHEDULE A, |) | |
| |) | |
| Defendants. |) | |
| |) | |

CONSENT JUDGMENT

Upon consent of Plaintiffs Hangzhou Chic Intelligent Technology Co. (“Chic”) and Unicorn Global, Inc. (“Unicorn”) (collectively, “Plaintiffs”) and Defendant eBay store authorized_reseller with the PayPal account email: rauthorized@gmail.com (“Defendant”), judgment is entered against Defendant upon Plaintiffs’ Third Amended Complaint, and it is ORDERED, ADJUDGED, and DECREED that:

1. Plaintiffs commenced this action for patent infringement against Defendant, and other defendants, on August 17, 2020. The complaint was subsequently amended to add and remove certain parties. The current complaint alleges infringement of U.S. Design Patent Nos. D737,723, D738,256, D785,112, and D784,195 (collectively, “Patents-in-Suit”). Defendant has reviewed a copy of the Third Amended Complaint filed by Plaintiffs in this action.
2. This Court has jurisdiction over Defendant and Plaintiffs and over the subject matter of the Third Amended Complaint.

3. Plaintiffs allege that Chic is the assignee of all rights, title, and interest in the Patents-in-Suit, and that Unicorn is the exclusive U.S. distributor of Plaintiffs' products which incorporate the Patents-in-Suit.
4. Plaintiffs have alleged that Defendant has infringed the Patents-in-Suit under 35 U.S.C. § 271 by making, using, selling, offering for sale, importing and/or otherwise distributing self-balancing transport devices known as hoverboards. Defendant has not answered the Third Amended Complaint. Defendant has agreed to stop making, using, selling, offering for sale, importing and otherwise distributing any products accused of infringement in the litigation and any colorably similar products, and have consented to entry of a permanent injunction. Defendant admits that all claims of the Patents-in-Suit are infringed and concedes that all claims of the Patents-in-Suit are valid and enforceable.
5. Defendant, its respective officers, agents, servants, employees, and other persons who are in active concert or participation with Defendant (including their directors, partners, members, affiliates, subsidiaries, assigns, and successors-in-interest to the extent permitted by Fed. R. Civ. P. 65) are permanently enjoined (unless expressly permitted by Plaintiffs) during the terms of the Patents-in-Suit from infringing the Patents-in-Suit, including, without limitation, by the making, using, selling, offering for sale, importing and otherwise distributing in the United States any of the products referred to in paragraph 4 above.
6. Accordingly, Defendant is dismissed from this action with prejudice. This Order does not affect the other defendants in this action and the action therefore will continue to proceed against the defendants other than Defendant.
7. This Court shall retain jurisdiction over Defendant for purposes of enforcing this Consent Judgment.

8. The right to enforce this Consent Judgment shall transfer to any successor-in-interest to Chic, and/or Unicorn.

9. Each party shall bear its own costs and attorneys' fees.

SO ORDERED this __ day of August 2021:

Judge Thomas Durkin
United States District Judge

AGREED TO:

Dated: August 5, 2021

/s/ Adam Kelly

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Dated: August 5, 2021

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